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7	COUNSEL FOR TRANS UNION LLC		
	**Designated Attorney for Personal Service** Kurt Bonds, Esq.		
8	Nevada Bar No.: 6228		
9	6605 Grand Montecito Parkway, Suite 200 Las Vegas, Nevada 89149		
10	Las vegas, rievada 67147		
11	IN THE UNITED STATES DISTRICT COURT		
12	FOR THE DISTRICT OF NEVADA		
13	DANIEL HOLSTEIN,	Case No. 2:21-cv-02199-JAD-VCF	
14	Plaintiff,	TOTALE MOTION AND ODDER	
	v.	JOINT MOTION AND ORDER EXTENDING DEFENDANT TRANS	
15	TRANSUNION, LLC, EXPERIAN	UNION LLC'S TIME TO FILE AN	
16	INFORMATION SOLUTIONS, INC. and AVANT, LLC,	ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT	
17	Defendants.	(FIRST REQUEST)	
18	Bereitaans.	(This The QUEST)	
19			
20	Plaintiff Daniel Holstein ("Plaintiff") and Defendant Trans Union LLC ("Trans Union")		
21	by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union's		
22			
23	Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.		
24	1. On December 14, 2021, Plaintiff filed his Complaint. The current deadline fo		
25	Trans Union to answer or otherwise respond to Plaintiff's Complaint is January 6, 2022.		
	2. On December 30, 2021, counsel for Trans Union communicated with Plaintiff's		
26	counsel via email regarding an extension within which to file a response to the Complaint, an Plaintiff's counsel agreed to the extension.		
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28	1 familif 5 counsel agreed to the extension.		

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3.	The parties will actively discuss a potential early resolution of this case, and the
parties bel	ieve an extension of this nature may save waste of the parties' time and expense. The
additional	time will allow Plaintiff and Trans Union time to fully explore such early settlement
discussions	S.

- 4. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.
- 5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including February 7, 2022. This is the first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 6th day of January 2022.

# QUILLING SELANDER LOWNDS WINSLETT & MOSER, P.C.

/s/ Jennifer Bergh

## JENNIFER BERGH

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## CONTEMPORARY LEGAL SOLUTIONS PLLC

# /s/ Robert M. Tzall

## **ROBERT M. TZALL**

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Henderson, NV 89014

(702) 666-0233

Counsel for Plaintiff

# **ORDER**

The Joint Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

Dated this 6th day of January 2022.

Cantack

UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE** I hereby certify that on this the 6th of January 2022, I filed JOINT MOTION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel: Robert M. Tzall office@contemporarylegalsolutions.com Contemporary Legal Solutions PLLC 2551 N. Green Valley Parkway, Building C Suite 303 Henderson, NV 89014 (702) 666-0233 Counsel for Plaintiff /s/ Jennifer Bergh JENNIFER BERGH